

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
U LOCK, INC.,	:	Case No. 22-20823-GLT
Debtor.	:	Chapter 7
CHRISTINE BIROS,	:	
Movant,	:	Related Doc. Nos.: 340, 357, 368, 454 & 455
v.	:	Hearing Date: July 14, 2023 @1:30pm
SHANNI SNYDER,	:	
Respondent.	:	
	:	

**MOVANT, CHRISTINE BIRO'S, SUPPLEMENTAL EXHIBIT AND WITNESS LIST
FOR EVIDENTIARY HEARING**

COMES NOW, Movant Christine Biros (the "Movant"), by and through her undersigned counsel, Bernstein-Burkley, P.C., and files the following Supplemental Exhibit and Witness List in preparation for the Evidentiary Hearing (the "Hearing") presently scheduled to commence on July 14, 2023, at 1:30 p.m. This list supplements the Movant's Pretrial Statement filed at Doc No. 454 and the Movant's Exhibit and Witness List filed at Doc. No. 455.

Supplemental List of Potential Witness

Below is a supplemental witness that the Movant may call at the Hearing.

4. Christine Biros
c/o Robert S. Bernstein
Bernstein-Burkley, P.C.
601 Grant Street, 9th Floor
Pittsburgh, PA 15219

Christine Biros was identified as a potential witness on the Pretrial Statement filed at Doc. No 454 on July 7, 2023 but was inadvertently omitted from the Exhibit and Witness List filed at Doc. No. 455.

Supplemental Exhibit To Be Offered By The Movant

Below is a supplemental exhibit that the Movant may offer at the Hearing.

Exhibit Number	Bates Range	Date of Exhibit	Witness	Description	Objections/ Rulings/ Exceptions
24	BIROS_000309 - BIROS_000313	7/11/23	Shanni Snyder	Shanni Snyder's Supplemental Responses and Objections to Interrogatories and Requests for Production of Documents Bankr. W.D. Pa. Case No. 22-20823-GLT	

As its date indicates, Exhibit 24 did not yet exist at the time the parties filed their original exhibit list. Counsel for Respondent has indicated their consent to the inclusion of this exhibit.

The Movant reserves the right to further supplement this list of exhibits and witnesses and to refer to (or offer into evidence) any exhibit that any other party in interest identifies in its exhibit list. The Movant also reserves the right to present demonstratives for use during witness testimony and cross-examination. The Movant also reserves the right (a) to request that the Court take judicial notice of any exhibits, any documents filed in this case, and the Court's docket as necessary and (b) to amend or further supplement these witnesses and exhibit lists.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

Dated: July 13, 2023

By: /s/ Stuart C. Gaul, Jr.

Robert S. Bernstein, Esq.

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Counsel for Christine Biros

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:)	
)	Bankruptcy No. 22-20823-GLT
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U LOCK INC,)	Chapter 7
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Debtor.)	
CHRISTINE BIROS,)	
)	Related Doc. Nos.: 340, 357, 368, 454,
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Movant,)	
v.)	Hearing Date/Time: July 14, 2023 @1:30pm
)	
SHANNI SNYDER,)	
)	
Respondent.)	
)	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of foregoing Supplemental Exhibit List was served this 13th day of July, 2023 upon all parties and counsel of record via this Court's CM/ECF System, as follows:

Leonard J. Berger, Jr on behalf of Interested Party Emanuel Snyder
attyljb@hotmail.com

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Michael F. Santicola on behalf of Interested Party USAAG Systems Co.

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BERNSTEIN-BURKLEY, P.C.

Dated: July 13, 2023

By: /s/ Stuart C. Gaul, Jr.
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